

1 RENE L. VALLADARES  
Federal Public Defender  
2 Nevada State Bar No. 11479  
BENJAMIN F. J. NEMEC  
3 Assistant Federal Public Defender  
411 E. Bonneville, Ste. 250  
4 Las Vegas, Nevada 89101  
(702) 388-6577/Phone  
5 (702) 388-6261/Fax  
Ben\_Nemec@fd.org

6 Attorney for Samvel Asoyan

7  
8 **UNITED STATES DISTRICT COURT**  
9 **DISTRICT OF NEVADA**

10 UNITED STATES OF AMERICA,  
11  
12 Plaintiff,  
13 v.  
14 SAMVEL ASOYAN,  
15 Defendant.

Case No. 2:23-cr-00168-JCM-BNW

**Stipulation to Extend Time to File  
Defendant's Reply to Response to  
Motion to Suppress  
(First Request)**

16  
17 IT IS HEREBY STIPULATED AND AGREED, by and between Jason M. Frierson,  
18 United States Attorney, and David C. Kiebler, Assistant United States Attorney, counsel for the  
19 United States of America, and Rene L. Valladares, Federal Public Defender, and Benjamin F.  
20 J. Nemec, Assistant Federal Public Defender, counsel for Samvel Asoyan, request that the due  
21 date for Mr. Asoyan's Reply to Response to Motion to Suppress, be extended from April 4,  
22 2024, to April 18, 2024; and that the due date for the government's surreply be set for April 25,  
23 2024.

24 This Stipulation is entered into for the following reasons:

25 1. There is expected forthcoming disclosures from Mr. Asoyan's subpoena on  
26 Motorola Solutions. There is also an upcoming hearing on Motorola Solution's Motion to  
Quash Mr. Asoyan's subpoena, which may garner further disclosures.

1           2.       Given these forthcoming disclosures, Mr. Asoyan requests his reply deadline  
2 for his Motion to Suppress be continued to April 18, 2024 so he can incorporate these  
3 disclosures into his Reply, potentially obviating the need for a Supplement.

4           3.       Because the disclosures may bring new factual arguments not made in Mr.  
5 Asoyan's Motion to Suppress, the parties request this Court set a surreply deadline for April  
6 25, 2024, so the government can respond to any new factual arguments made in the Reply.

7           This is the first request for a continuance of the reply deadline.

8           DATED this 4th day of April 2024.

9  
10       RENE L. VALLADARES  
11       Federal Public Defender

          JASON M. FRIERSON  
          United States Attorney

12       By /s/ Benjamin F. J. Nemec  
13       BENJAMIN F. J. NEMEC  
14       Assistant Federal Public Defender

          By /s/ David C. Kiebler  
          DAVID C. KIEBLER  
          Assistant United States Attorney

1  
2 **UNITED STATES DISTRICT COURT**  
3 **DISTRICT OF NEVADA**

4 UNITED STATES OF AMERICA,

5 Plaintiff,

6 v.

7 SAMVEL ASOYAN,

8 Defendant.  
9

Case No. 2:23-cr-00168-JCM-BNW

ORDER

10  
11 IT IS THEREFORE ORDERED that upon consideration of Defendant's Request to  
12 Extend Time for filing his Reply to Response to Motion to Suppress, that the Defendant's  
13 deadline to file his Reply is extended to April 18, 2024; and that the Government's deadline to  
14 file its surreply is set for April 25, 2024.

15 DATED this 5 day of April 2024.

16  
17   
18 UNITED STATES DISTRICT JUDGE  
19  
20  
21  
22  
23  
24  
25  
26